## REMARKS

Claims 1-7, 18-30, 34-37, 40, and 41 were pending in the application.

Claims 1-7, 18-30, 34-37, 40, and 41 were rejected.

Claims 18-27, 34-36, 40, and 41 have been canceled.

Claim 1 has been amended.

Claims 42-58 have been added.

Reconsideration and allowance of claims 1-7, 28-30, 37, and 42-58 is respectfully requested in view of the following.

**The Amendments To The Specification:**

The specification has been amended on page 8 to correct a number of typographical errors. No new matter has been added.

**The Rejection of Claims 1, 28, 29, and 30 under 35 U.S.C. § 102:**

Claims 1, 28, 29, and 30 were rejected under 35 U.S.C. § 102 as being anticipated by Campbell et al. (WO 97/21901). The Applicant respectfully disagrees.

Campbell et al. discloses a tubing connector (12) for coupling adjacent slotted tubing (10,11) that includes expandable slotted tubular portions (16,17) that are coupled end-to-end by threaded couplings (20,21). The threaded couplings (20,21) are located on portions of the expandable slotted tubular portions (16,17) that are not radially expanded (see, e.g., page 2, lines 16-18; page 3, lines 23-28; and claim 1).

Claim 1, as amended, recites an expandable tubular assembly, comprising:

a pair of radially expanded tubular members having radially expanded threaded portions coupled to one another; and

a quantity of a sealant within the radially expanded threaded portions of the radially expanded tubular members.

By contrast, the threaded couplings (20,21) of the tubing connector (12) of

Campbell et al. are never radially expanded. Thus, Campbell et al. does not disclose the invention of claim 1. Furthermore, for at least the same reason, Campbell et al. also does not disclose the invention of claims 28, 29, and 30, that depend from claim 1.

**The Rejection of Claims 2-6 under 35 U.S.C. § 103:**

Claims 2-6 were rejected under 35 U.S.C. § 103 as being obvious in view of Campbell et al. and the disclosure of the Jet-Lock III High Friction Thread Compound provided on page 7 of the present application. The Applicant respectfully disagrees.

As described above, the threaded couplings (20,21) of Campbell et al. are located on portions of the expandable slotted tubular portions (16,17) that are not radially expanded (see, e.g., page 2, lines 16-18; page 3, lines 23-28; and claim 1). Thus, for at least the reasons described above with reference to claim 1, Campbell et al. does not disclose the invention of claims 2-6, that depend from claim 1. Furthermore, Campbell et al. is completely silent as to the sealant limitations recited in claims 2-6.

The disclosure of the Jet-Lock III High Friction Thread Compound provided on page 7 of the present application does not qualify as prior art to the present application under any of the statutory provisions of 35 U.S.C. § 102. Furthermore, the examiner has failed to provide any prior art evidence that would suggest using Jet-Lock III High Friction Thread Compound for providing a seal between radially expanded threaded connections as described in the specification of the present application. Thus, the examiner has failed to establish a prima facie case of obviousness. Therefore, claims 2-6 are not obvious in view of the prior art of record in the present application.

**The Rejection of Claim 7 under 35 U.S.C. § 103:**

Claim 7 was rejected under 35 U.S.C. § 103 as being obvious in view of Campbell et al. and Thurber (U.S. 5,426,130). The Applicant respectfully disagrees.

As described above, the threaded couplings (20,21) of Campbell et al. are located on portions of the expandable slotted tubular portions (16,17) that are not radially expanded (see, e.g., page 2, lines 16-18; page 3, lines 23-28; and claim 1). Thus, for at least the reasons described above with reference to claim 1, Campbell et al. does not disclose the invention of claim 7, that depends from claim 1. Furthermore,

Campbell et al. is completely silent as to the sealant limitations recited in claim 7.

Thurber discloses an adhesive system. The adhesive system of Thurber does not disclose: an expandable tubular assembly, comprising:

a pair of radially expanded tubular members having radially expanded threaded portions coupled to one another; and

a quantity of a sealant within the radially expanded threaded portions of the radially expanded tubular members, as recited in claim 7.

Thus, the combination of Campbell et al. and Thurber does not disclose or suggest the invention of claim 7.

**The Rejection of Claim 37 under 35 U.S.C. § 103:**

Claim 37 was rejected under 35 U.S.C. § 103 as being obvious in view of Campbell et al. and Thurber (U.S. 5,426,130). The Applicant respectfully disagrees.

Campbell et al. discloses a tubing connector (12) for coupling adjacent slotted tubing (10,11) that includes expandable slotted tubular portions (16,17) that are coupled end-to-end by threaded couplings (20,21). The threaded couplings (20,21) are located on portions of the expandable slotted tubular portions (16,17) that are not radially expanded (see, e.g., page 2, lines 16-18; page 3, lines 23-28; and claim 1). The threaded couplings (20,21) may be secured by an adhesive.

Claim 37 recites an expandable tubular assembly, comprising:

a pair of tubular members having threaded portions coupled to one another; and

a quantity of a sealant within the threaded portions of the tubular members;

wherein the sealant is selected from the group consisting of epoxies, thermosetting sealing compounds, curable sealing compounds, and sealing compounds having polymerizable materials;

wherein the sealant includes an initial cure cycle and a final cure cycle;

wherein the sealant can be stretched up to about 30 to 40 percent without failure;

wherein the sealant is resistant to conventional wellbore fluidic materials;

wherein the material properties of the sealant are substantially stable for

temperatures ranging from about 0 to 450 °F; and

wherein the threaded portions of the tubular members include a primer for improving the adhesion of the sealant to the threaded portions.

Campbell et al. is completely silent as to the material properties of the sealant

Thurber discloses an adhesive system. Thurber does not disclose an expandable tubular assembly, comprising:

a pair of tubular members having threaded portions coupled to one another; and

a quantity of a sealant within the threaded portions of the tubular members;

wherein the sealant is selected from the group consisting of epoxies, thermosetting sealing compounds, curable sealing compounds, and sealing compounds having polymerizable materials;

wherein the sealant includes an initial cure cycle and a final cure cycle;

wherein the sealant can be stretched up to about 30 to 40 percent without failure;

wherein the sealant is resistant to conventional wellbore fluidic materials;

wherein the material properties of the sealant are substantially stable for temperatures ranging from about 0 to 450 °F; and

wherein the threaded portions of the tubular members include a primer for improving the adhesion of the sealant to the threaded portions, as recited in claim 37.

Thus, the combination of Campbell et al. and Thurber does not disclose or suggest the invention of claim 37.

For the reasons set forth above, it is submitted that the outstanding rejections of claims 1-7, 28-30, and 37 are overcome. Furthermore, new claims 42-58 are in condition for allowance.

Unless stated otherwise, none of the amendment to the claims were made for reasons substantially related to the statutory requirements for patentability.

Furthermore, unless stated otherwise, the amendment to the claims were made to simply make express what had been implicit in the claims as originally worded and therefore is not a narrowing amendment that would create any type of prosecution history estoppel.

## Conclusion

In view of the foregoing amendments and remarks, it is respectfully submitted that the pending claims are drawn to novel subject matter, patentably distinguishable over the prior art of record. The Examiner is therefore respectfully requested to reconsider and allow claims presented for reconsideration herein. To the extent that the present amendment results in additional fees, the Applicant authorizes the Commissioner to charge deposit account no. 08-1394.

Should the Examiner deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the below listed telephone number.

Respectfully submitted,

Todd Mattingly
Registration No. 40,298

Dated: 6/7/2002

HAYNES AND BOONE, L.L.P.
1000 Louisiana Street
Suite 4300
Houston, Texas 75002-5012
Telephone: 713/547-2301
Facsimile: 713/547-2600
File: 25791.37.02

EXPRESS MAIL NO.: EL139911898US

DATE OF DEPOSIT: June 7, 2002

This paper and fee are being deposited with the U.S. Postal Service Express Mail Post Office to Addressee service under 37 CFR §1.10 on the date indicated above and is addressed to the BOX Fee Amendment, Assistant Commissioner for Patents, Washington, D.C. 20231.

Michelle Baxter
Name of person mailing paper and fee

Michelle Baxter
Signature of person mailing paper and fee

**Amended Claims**

1. (Amended) An expandable tubular assembly, comprising:

a pair of radially expanded tubular members having radially expanded threaded portions coupled to one another; and

a quantity of a sealant within the radially expanded threaded portions of the radially expanded tubular members.